

EPA Registration File No. 84229-16

Material to be added to an e-Jacket/Jacket

Reg. No. 84229-16

Decision # 437723

Description:

New registration

1. Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top = newest)
- ☐ File Location: (eg. "before page 45 in .pdf")

2. ☒ Send to Data Extraction contractors this material:

☒ Newly stamped accepted label

☐ Notification

☒ New CSF

☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: He Bo + J

Division: RD

Phone: 306-0415

Date: 11-5-10



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Chemical Safety and Pollution Prevention
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

84229-16

Date of Issuance:

NOV 5 2010

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

Tide Technical Imidacloprid

Name and Address of Registrant (include ZIP Code):

Tide International USA, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product when the Agency requires all registrants of similar products to submit such data.
2. Make the following label changes before you release the product for shipment:
 - a. Revise the EPA Registration Number to read, "EPA Reg. No. 84229-16".
3. The data requirements for storage stability (830-6317) and corrosion characteristics (830-6320) have not been satisfied, and must be submitted within eighteen months of the date of this letter.

Signature of Approving Official:

Venus Eagle, Product Manager (01)
Insecticide-Rodenticide Branch, Registration Division (7505P)

Date:

NOV 5 2010

4. Submit one copy of the revised final printed label for the record before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact Kable Bo Davis at (703) 306-0415 davis.kable@epa.gov.

Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure- Stamped Labeling

Tide Technical Imidacloprid
FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

Imidacloprid,

1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 99.0%

OTHER INGREDIENTS: 1.0%

TOTAL:..... 100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 1-800-424-9300 for emergency medical treatment information.	

EPA Reg. No. 84229-xx
EPA Est. No.

Manufactured for:
Tide International USA, Inc.
21 Hubble
Irvine, CA 92618

Net Weight:

ACCEPTED
with COMMENTS
In EPA Letter Dated:

NOV 5 2010

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

84229-16

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is to be used only for formulation into registered insecticide products and is not for resale under this label.

Instructions to Formulators: This technical product may be used to manufacture insecticide end-use products for:

- 1) Terrestrial Non-Food Crop, Residential and Commercial Outdoor (including Greenhouses): lawn, turf and ornamentals in and around residential or commercial buildings;
- 2) Residential and Commercial Indoor Non-Food: Greenhouse ornamentals
- 3) Terrestrial Non-food Crop Use, Domestic Indoor & Outdoor Use: companion animals.
- 4) Uses for which U. S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration;
- 5) Uses for experimental purposes that are in compliance with U.S. EPA requirements; and
- 6) Terrestrial Food Crops, including:

Barley	Pecan
Head and Stem <i>Brassica</i> Vegetables	Pome Fruits
Bushberries	Potato (including seed piece treatment)
Canola	Root Vegetables
Citrus (containerized and field)	Strawberries
Cotton	Stone Fruit
Cranberries	Sugarbeet
Fruiting Vegetables	Tobacco
Grapes	Tuberous and Corm Vegetables
Greenhouse Vegetables (tomato, cucumber)	Tropical Fruits
Hops	Oats
Leafy Petiole Vegetables	Rye
Leafy Vegetables	Sorghum
Legume Vegetables	Wheat

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL:

Container Disposal – Liner: Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill.

Container Disposal – Outer Drum: Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of box in a sanitary landfill.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Tide International USA, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Tide International USA, Inc. and Seller harmless for any claims relating to such factors.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. or Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

[EPA approval date]

Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Tide International USA, Inc. 21 Hubble Irvine, CA 92618	EPA File Symbol/Registration Number 84229-
	Product Name Tide Technical Imidacloprid
	Date of Confidential Statement of Formula (EPA Form 8570-4) 07/22/2010

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Imidacloprid

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Imidacloprid	[REDACTED]	[REDACTED]
Signature 	Name and Title Michael Kellogg / Agent	Date 7/22/10

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA

Copy 2 - Applicant copy

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

July 22, 2010

COURIER DELIVERY

Venus Eagle (PM 1)
Document Processing Desk (**REGFEE**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

RE: Tide International USA, Inc. – Tide Technical Imidacloprid (EPA Reg. No. 84229-)
Application for a New Pesticide Registration

Dear Ms. Eagle,

On behalf of Tide International USA, Inc. please find the enclosed application materials for registration of Tide Technical Imidacloprid, a technical product containing imidacloprid as the active ingredient.

In support of this application, we submit the following documents:

1. Application for a New Pesticide Registration (EPA Form 8570-1)
2. Receipt of PRIA pre-payment from pay.gov
3. Confidential Statement of Formula
4. Five (5) copies of the proposed labeling
5. Certification With Respect to Label Integrity
6. One copy of the Tide Technical Imidacloprid proposed label on CD
7. Formulator's Exemption Statement (EPA Form 8570-27)
8. Letter of Authorization

We trust you will find this application complete and in compliance with the requirements for registration under FIFRA. Please feel free to call me if you have any questions or need any additional information.

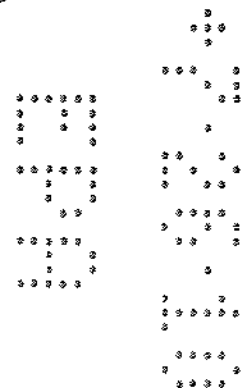
Sincerely,



Michael Kellogg

Enclosures

cc: D. Wang; Tide International USA, Inc.



Please read instructions on reverse before completing form.

Form Approved, O No. 2070-0060, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 84229-RA	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tide International USA, Inc. / Tide Technical Imidacloprid	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Tide International USA, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. XXXXXXXXXX Product Name XXXXXXXXXX	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application falls under R300 (44) since it is a 100% repack of a registered product and no data is being submitted. The fee due is \$1365 and the decision timeline is 3 months. A receipt of pre-payment from pay.gov is enclosed with this application for registration. Should you have any questions, please contact me at (email) Mike@PyxisRC.com or (phone) 253-853-7369.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) lined fiber drum		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.2 kg (5 lb), 20 kg (44 lb), 25 kg (55)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label Is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Michael Kellogg		Title Agent		Telephone No. (Include Area Code) (253) 853-7369	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.					6. Date Application Received (Stamped) <div style="border: 1px solid black; padding: 5px; text-align: center;"> RECEIVED JUL 22 2010 </div>
2. Signature 		3. Title Agent			
4. Typed Name Michael Kellogg		5. Date 7/22/10			

Mike Kellogg

From: paygovadmin@mail.doc.twai.gov
Sent: Thursday, July 22, 2010 4:36 PM
To: Mike Kellogg
Subject: Pay.Gov Payment Confirmation

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Your transaction has been successfully completed.

Transaction Summary

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 251660GJ
Agency Tracking ID: 74128228884

Account Holder Name: Der I Wang
Transaction Type: Sale
Transaction Amount: \$1,365.00
Billing Address: 2007A, Via Mariposa West
City: Laguna Woods
State/Province: CA
Zip/Postal Code: 92637
Country: USA
Card Type: American Express
Card Number: *****1006
Transaction Date: Jul 22, 2010 7:35:51 PM

Decision Number:
Registration Number: 84229-xx
Company Name: Tide International USA
Company Number: 84229
Action Code: R300



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 28, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-437723
EPA File Symbol or Registration Number: 84229-RA
Product Name: TIDE TECHNICAL IMIDACLOPRID
EPA Receipt Date: 26-Jul-2010
EPA Company Number: 84229
Company Name: TIDE INTERNATIONAL, USA, INC.

JANELLE KAY
TIDE INTERNATIONAL, USA, INC.
C/O PYXIS REGULATORY CONSULTING, INC
4110 136TH ST. NW
GIG HARBOR, WA 98332-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R300

NEW PRODUCT;ME-TOO PRODUCT FAST TRACK;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely, *Teresa Downs*
Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

W
{879092>~

This package includes the following

☒ New Registration

☐ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: _____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

1

Receipt No.

S-

879092

EPA File Symbol/Reg. No.

84229-RA

Pin-Punch Date:

7/26/2010

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R300

Granted:

R300

Amount Due: \$ 1365

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *JM*

Date: *7/27/10*

Remarks:

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 7-26-10

Experts In-Processing Signature: B. R

Date 7-28-10

Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>84229-RA</u>		EPA Receipt Date: <u>7-26-10</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form) a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A) <div style="display: flex; justify-content: flex-end; margin-top: 5px;"> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">yes</div> <div style="border: 1px solid black; padding: 2px;">no</div> </div>			X		
3	Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack) Certificate and data matrix consistent					X
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B) <div style="display: flex; justify-content: flex-end; margin-top: 5px;"> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">yes</div> <div style="border: 1px solid black; padding: 2px;">no</div> </div>					
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)			X		
5	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack) <div style="display: flex; justify-content: flex-end; margin-top: 5px;"> <div style="border: 1px solid black; padding: 2px; margin-right: 5px;">yes</div> <div style="border: 1px solid black; padding: 2px;">no</div> </div> a) Selective Method (Fee category experts use) b) Cite-All (Fee category experts use) c) Applicant owns all data (Fee category experts use)					X
6	5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)			X		

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)			X
8	Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)			/
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)			/
10	Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

There are no studies associated
with this jacket.

100% repack

TU 7/28/16

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to <http://www.epa.gov/opprd001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/opppbpd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/opprd001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

21-Day Screen Completed by
Contractor

21-Day Expires on 8-16-10

Jacket # 84229-RA
MRID# _____

Content Screen: Recommended to
Pass/Fail

86-5 Review: Passed/Failed/**NA**

Transfer This Jacket to:

STEPHEN SCHAIBLE

PM-1

ISB'S Front-end PRIA Completeness Screen

Draft 3; 10/25/07

EPA Receipt Date: <i>7/26/10</i>		EPA Reg. Number: <i>84229-RA</i>		
	Check List Item	Yes	No	N/A
1	Has the PRIA Fee been Paid; is a copy of the check or Pay.gov receipt included in the Submission Package?	✓		
2	Is an Application Form (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?	✓		
3	Is a Confidential Statement of Formula (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?	✓		
4	Is a Formulator's Exemption Statement (EPA Form 8570-27) Included in the Submission Package?	✓		
5	Is a Certification with Respect to Citation of Data (EPA Form 8570-34) Included in the Submission Package?		✓	
6	Is a Data Matrix (EPA Form 8570-35) Included in the Submission Package?		✓	
7	Is a Label Included in the Submission Package?	✓		
8	Are Data Included in the Submission Package?		✓	
9	Is the Submission an Amendment?		✓	

NEW APPLICATIONS

DATE: 7/26/10

FILE NUMBER: 84229-RA

FEP (OPPIN ENTRY) per 7/26/10
(Initial & date)

FILE ROOM: _____
(Initial & date)

SIG: _____
(Initial & date)

FILE ROOM: _____
(Initial & date)

X ASSIGN TO PM 01 (NO DATA)

____ JACKET TO SHELF (DATA)

To the Document Center (ITRMD)

*Please transfer jacket/mini-jacket to the Product Manager Team circled below:

Minor Use Section: **PM -5**

Insecticide Branch: **PM -10** **PM-13**

Herbicide Branch: **PM-23** **PM-25**

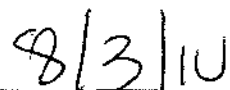
Fungicide Branch: **PM-20** **PM-21** **PM-22**

Insect/Rodent Branch: **PM-1** **PM-7**

*Reminder to PM – If applicable, pick-up data from the Screening Room.

Processed by RD's Completeness Check Team


(Team Member Signature)


(Date)



Tide International (USA) Inc.

21 Hubble, Irvine, CA 92618, USA. Phone: 949-679-3535 Fax: 949-679-3538

December 28, 2009

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay and Michael Kellogg of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Der-I Wang, Ph.D.

Vice President

cc: Pyxis Regulatory Consulting, Inc.

